United States Environmental Protection Agency

Region 10 Emergency Response Unit

POLLUTION REPORT

I. HEADING

Date: May 22, 2000
Subject: CleanCare Removal Site (CleanCare), Tacoma, Washington
From: Michael Szerlog, OSC, USEPA, Region 10, Emergency Response Unit
Tel: Office (206) 553-0279
TO: See Distribution List on last page

POLREP No. 23 (Progress)

II. BACKGROUND

Site ID:	SSID # 106W
Delivery Order No:	081-10 -02
Response Authority:	CERCLA,
CERCLIS No:	WASFN1002182
NPL Status:	Not Listed (former RCRA site within Commencement Bay Superfund site)
State Notification:	Washington State Department of Ecology referred site to EPA
Action Memo Status:	Signed on December 17, 1999 and January 7, 2000
Removal Start Date:	December 17, 1999
Expected Completion Date:	March 17, 2001
Site Web Page:	www.epa.gov/region10/, click Index, click C for CleanCare. or use URL: http://yosemite.epa.gov/r10/cleanup.nsf/sites/CleanCare

III. SITE INFORMATION

A. Incident Category

This is a time-critical removal action at an inactive waste management facility.

B. Site Description

1. Site Location

The CleanCare site is located at 1510 Taylor Way in Pierce County, City of Tacoma, Washington at Township 21, Range 3 E. in Section 26. The site comprises approximately 4.2 acres latitude 47° 16' 25" North and longitude 122° 23' 32" West. The site is located in the “Tacoma Tideflats” area about three miles northeast of downtown Tacoma. The site is owned by David Bromley of Bromley-Marr ECOS Inc.

The CleanCare site was an interim status treatment, storage, disposal, and recycling (TSD) facility for off-site generated hazardous and non-hazardous wastes - one of a handful of commercial TSDs operating in the state of Washington. When the facility was in operation its major function was to solidify oily sludge wastes originating from catch basins, sumps, and storm drains; recycle waste oils, antifreeze, and spent solvents; and crush used oil filters for off-site recycling by other facilities.

The CleanCare facility has four separate tank farms (Tank Farm (TF)-1, TF-2, TF-3, and TF-4), two hazardous/dangerous waste container storage pads (container storage (CS) CS-4A and CS-4B), and a processing area where the distillation of solvent, oil, and antifreeze used to occur.

IV. Response Information

A. Situation

1. Current Situation

Monday May 15, 2000 (Monday)
Personnel on site: 3 START, 10 ERRS, 1 USCG, 2 EPA
Weather : Clear, temps in the 50's to low 70's F.
All site personnel attended daily safety meeting and discussed site safety and planned activities. START provided continuous air monitoring on site (air monitoring data was below the onsite action level), continued data management and updated the weekly Pollution Report for the week ending May 12 (No. 22). ERRS staged RCRA and non-RCRA drums and debris, pumped 19,699 gallons from Tank 5 for disposal by Solpro, pumped 20,085 gallons of oily-water from Tank Farm 2 for disposal by Emerald Services, Solidified RCRA and non-RCRA sludge, prepare dumpsters for transport, and bulk waste into proper waste streams.

May 16, 2000 (Tuesday)
Personnel on site: 3 START, 10 ERRS, 1 USCG
Weather: Clear, temps in the 50's to low 70's F.
All site personnel attended daily safety meeting and discussed site safety and planned activities. START conducted routine air monitoring across the site and specific monitoring during pumping activities throughout the day (air monitoring data was below the onsite action level), continued data management, collected air samples for lab analysis and collected treated water samples from the temporary waste water treatment plant . ERRS pumped Tank 5 for disposal by Solpro (19,446 gallons), pumped Tank Farm 2 for disposal by Emerald (4,948 gallons), solidified material from oil sludge drums, swept site for miscellaneous containers, and staged RCRA and non-RCRA debris.

May 17, 2000 (Wednesday)
Personnel on site: 3 START, 11 ERRS, 1 USCG, 1 EPA
Weather: Intermittent light rain and sun, mostly cloudy, temperatures ranged from 40's to the lower 60's F.
All site personnel attended daily safety meeting and discussed site safety and planned activities. START conducted routine air monitoring across the site (air monitoring data was below the onsite action level), continued data management, and performed XRF spectrum analysis for lead content in paint on tanks in Tank Farm 1. ERRS began to replaced four of the carbon filters in the waste treatment system, solidified material from oil sludge drums, shipped the remaining three gas cylinders, staged RCRA and non-RCRA debris, and began to replace the carbon in the air scrubbers.

May 18, 2000 (Thursday)
Personnel on site: 3 START, 11 ERRS, 1 USCG, 1 EPA
Weather: Mostly cloudy intermittent rain, temperatures ranged from 40's to the lower 60's F.
All site personnel attended daily safety meeting and discussed site safety and planned activities. START continued air monitoring, continued data management, and prepared discharge request for the City of Tacoma SUOD. ERRS finished replacing four carbon filters in the waste water treatment system, finished replacing carbon in the four air scrubbers, cleaned Baker Tank® #6, pumped Tank 4 for disposal by Solpro (27,215 gallons), and pumped Tank 5 for disposal by Prime (10,000 gallons).

May 19, 2000 (Friday)
Personnel on site: 2 START, 11 ERRS, 1 USCG, 1 EPA
Weather: Cloudy with intermittent sun, temperatures ranged from low 50's to mid 60's F. All site personnel attended daily safety meeting and discussed site safety and planned activities. START continued ambient air monitoring throughout the site and continued organizing site data. ERRS discharged treated contact water (Baker Tank® #22 Batch #19, 20,000 gallons) and continued water treatment activities, completed

cleaning of Baker Tank® #24, continued pumping of Tank 4 for disposal by Solpro (5,682 gallons), pumping of Tank 5 for disposal by Prime (14,500 gallons), and continued to solidify oil sludge drums in sludge boxes.

2. Removal Actions to Date

On January 7, 2000, the Action Memorandum to increase site ceiling, to ask for a $2 million exemption, a 12-month exemption, and a change of scope was signed. A purchase request was also signed and ERRS was funded, incrementally, to begin removal activities.

The State (Washington Department of Ecology) continues to provide concurrence on waste designation. The City (City of Tacoma Public Works) continues to provide assistance with discharge of treated waste water.

Drums -

RCRA Drums: Finished segregation and inventory of all non oil filter drums known to be located on the site (formerly referred to as RCRA drums). Selected generators have removed a total of 570 drums and 12 totes of waste. Remaining drums undergoing segregation and bulking with similar waste streams prior to disposal. Approximately 700 empty RCRA drums were removed from the site by Emerald Services.

Oil Sludge Drums: Sludges from miscellaneous drums are being bulked and solidified on site and then transferred by Waste Management to Arlington Landfill.

Antifreeze Drums: Remaining drums have been staged to be bulked with glycols from Tank Farm 3 for disposal off site.

Solvent Drums: All solvent drums have been disposed of under contract with Safety Kleen**.**

RCRA Debris: Drums and debris are being solidified and disposed under contract with Philip Services.

Baker Tanks® - 14 tanks are currently on site. Tanks are being used to stock bulked materials, store treatment system waters, and store material from tank farms prior to disposal.

Surface Water - Continued treating site surface water and decontamination water with the temporary waste water treatment system. Treated and discharged of 15 batches to date (approximately 300,000 gallons total) of waste water to the City of Tacoma Sanitary Sewer System. Two batches (approximately 40,000 gallons) did not meet the

pretreatment requirements established by the city and were disposed off site.

ASTs - Tanks 1 and 3 are empty except for one foot of sludge which will be solidified and disposed of at a later date. The material from Tanks 4 and 5 will be transferred and disposed of by Emerald or Solpro, dependant of material characteristics. The contents of Tank Farm 2 will be transferred and disposed of by Emerald. The material in Tank Farms 3 and 4 has been characterized and is currently out for bid for disposal. Waters from Tank 33 have been treated on site and disposed to the Tacoma sanitary sewer. The oils and an sludges remain in Tank 33 to be bulked and disposed of at a later date. Tank 34 contains water and oil that will de disposed of off site at a later date. Water from the tanks in the Waste Water Treatment Building have been treated in the temporary water treatment system and disposed into the sanitary sewer after approval from the City of Tacoma.

Soil - An evaluation of soil treatment/disposal options is under review. No work on site was performed this week regarding soils. To date, 14 soil samples were collected during the assessment phase to characterize site soils.

3. Enforcement

The Region currently has some information regarding potential responsible parties (PRPs) at the site. Relevant facility files and documentation have been transported to a secured federal building. EPA intends to gather additional PRP information during the removal action.

B. Planned Removal Activities

To minimize/eliminate the threat to human health and the environment posed by the wastes on the site, the following removal activities are planned:

Drums: continued organization of drums and documents (manifests & profile analyses), hazard categorization and disposal tests, bulking and removal of containers from the site.

Baker Tanks®: The decontamination water from some tanks will continue to be treated on site and discharged. Emptied tanks that have no further use on site will be returned to the rental company.

Surface Water: management of surface water as it collects onsite (including sampling, treatment, and discharge), and treatment of AST water that meets the treatment criteria.

ASTs: Sludge remaining in Tank T-1 and T-3 will be transported to sludge bins for solidification. Continue disposal of the liquids in Tanks 4 and 5, sludges will be transported to sludge bins for solidification. Transport for solidification the sludges from tanks in TF 2 (Tanks T-6 through T-15) and determine disposal facilities for materials in TF 3 (Tanks T-18 through T-25), and TF 4 (Tanks T-26 through T-29).

Miscellaneous Containers: Characterization and sampling of approximately 10-20 large (50 to 200 gallon) containers on-site, completed.

C. Next Steps

EPA, ERRS, START, and the USCG Strike Team will continue managing onsite surface water. Continued data management including data for all remaining drums as well as analytical data for materials stored in the ASTs. Continued treatment and discharge of contact and non-contact surface water. Continue to transfer material from Tank Farms 1 and 2 for disposal off site. Continue to solidify sludges for disposal at Arlington Landfill. Continue to bulk material in Baker Tanks® and decontaminate tanks after material is disposed of, prepare and load PRM drums for Philips to transport, stage miscellaneous drums for labeling, haz-catting and disposal.

D. Key Issues

Security: Off Duty City of Tacoma Police continue with site security.

Management of site surface water: Contact surface water (that which falls with in the secondary containment structures) and non-contact water has been either treated on site or disposed off site. On site water treatment is performed in 20,000 gallon batches. Each batch is sampled, laboratory results are submitted to the City of Tacoma, and, with the City's approval, each batch is discharged to the Sanitary Sewer System. Previously some surface water was also disposed off site. Performing both tasks simultaneously reduced the length of time required to accomplish this task, reduced the associated costs, such as Baker Tank® rental fees, and removed the threat of a release. Currently, managing the surface waters with the temporary onsite treatment system is sufficient.

Drum/Container Waste: All 64 of the original generators that were given the opportunity to dispose of their wastes have done so. A total of 582 containers of waste were removed from the site by these generators, saving the EPA disposal costs. Other containers of waste are haz-catted, staged with similar compatible wastes, bulked and disposed as appropriate.

On-site facility files: Approximately eight hundred boxes of facility files and documents were transported to a secured federal facility.

V. Cost Information

Estimated costs are summarized below

	Established Ceiling	Estimated Costs as of date listed, percent of budget expended
EPA (Direct)	$ 150,000	$36,286 (5/21) 24,19%
EPA (Indirect)	$ 150,000	$79,829 (5/21) 53.22%
START	$ 350,000	$311,561 (5/21) 89.02%
ERRS	$ 2,100,000	$1,789,605 (5/18) 85.22%
Coast Guard	$100,000	$99,783 (5/21) 99.78%
Total	$ 2,700,000	$2,317,065 85.82%

Note: The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

VI Disposition of Wastes

Waste Stream	Medium	Quantity	Containment-Migration Control	Treatment	Disposal
Used Oil Filters	solid and solidified waste	270 cu yd	placed liners in reliefs	removed oil filters from 55 gallon drums and consolidated in reliefs	Waste Management delivered to Olympic View Sanitary Landfill
Used Oil Filter Drums	solid waste	170 cu yd	placed liners in reliefs	crushed drums with an excavator to reduce volume	Phillips Services Corp. Delivered to Bethlehem Steel for recycling.
Used RCRA Drums	solid waste	164 cu yd	placed liners in reliefs	crushed drums with an excavator to reduce volume	Phillips Services Corp. Delivered to Columbia Ridge Landfill.
	Solid waste	700 Drums	placed liners in reliefs	Hauled from site to be decontaminated	Emerald transferred from site to be decontaminated and reused
Generator Drums	sledges and liquids	570 drums and 12 totes	NA	generators contracted with TSDs to properly manage their waste	Brought to various disposal companies
Oily Debris	solidified waste	20 cu yd	placed liners in reliefs	consolidated in reliefs	Phillips Services Corp. delivered to Olympic View Sanitary Landfill
Contact Rain Water	liquid	319,708 gal	contained in Baker Tanks®	Emerald Petroleum Services's (EPS) water treatment plant	EPS, to City of Tacoma Sanitary Sewer
Contact Rain Water	liquid	123,400 gal	contained in Baker Tanks®	Phillips Services Corp. water treatment plant	Phillips Services Corp. to City of Tacoma Sanitary Sewer
Contact Rain Water	liquid	340,000 gal	contained in Baker Tanks®	treated on site with temporary waste water treatment system	to City of Tacoma Sanitary Sewer
Baker Tanks®	solid	Tank	NA	pressure washed, and wiped down	returned to Vendor (Baker Tanks®, Inc.)
Tip Trailers	solid	13 trailers	NA	transported off site to make room for other activities	temporarily stored at the Phillips Services Corp. facility adjacent to the site
Oil From Drums	liquid	142 drums + 4 totes	6,900 gallon poly tank on site	Transported off site for disposal	Removed by Emerald Petroleum with material from Tank 1
Antifreeze from Drums	liquid	65 drums	Bulked into Baker Tank® # 18	transported by Spencer	Delivered to Onyx for recycling
Tank Farm 1 Oily Water	liquid	21,100 gal	Bulked into Baker Tank® #10	transportation to be determined	to be determined
Tank 1 Layer 1	liquid	73,225 gal	Transferred to Vac Truck	transported by EPS	Delivered to EPS for recycling
Tank 1 Layer 2	liquid	34,437 gal	Transferred to Vac Truck	transported by Phillips Services Corp.	Delivered to Phillips Services Corp for recycling

Waste Stream	Medium	Quantity	Containment-Migration Control	Treatment	Disposal
Tank 1 Layer 3	liquid	168,269 gal	Transferred to Vac Truck (74,169 gal) Transferred to Baker Tank® for temporary storage (20,000)	transported by Waste Management	Delivered to Waste Management facility in Arlington, OR for solidification and disposal
Tank 1 Layer 4	liquid	155,904 gal	Transferred to Vac Truck	transported by Emerald	Delivered to Emerald facility in Seattle for recycling
A-Fuel/Solvent from Drums	liquid	24,000 gal	Bulked into Baker Tank® #9	10,000 gallons transported off site by Safety Kleen	Delivered to Araganite facility in Utah for recycling
Glycol From Drums	liquid	5,000 gal	Bulked into Baker Tank® #18	transportation to be determined	to be determined
PRM Drums	Solid Waste	80 55-gallon drums	Transferred to Philips	Transferred by Philips Services Corp.	Delivered to Philips Services Corp for recycling
Tank-30 Wastewater	liquid	10,371 gal	Transferred to Vac Truck	Transferred by Emerald	Delivered to Emerald for treatment
Tank 5	liquid	39,165 gal	Transferred to Vac Truck	Transferred by Solpro	Delivered to Solpro for disposal
Tank 4	liquid	33,197 gal	Transferred to Vac Truck	Transferred by Solpro	Delivered to Solpro for disposal
Tank 5	oily water	24,500 gal	Transferred to Vac Truck	Transferred by Prime	Delivered to Prime for disposal
Tank Farm 2	oily water	25, 033 gal	Transferred to Vac Truck	Transferred by Emerald	Delivered to Emerald for disposal
Tank 3	Liquid	112,705 gal	Transferred to Vac Truck	Transferred by Solpro	Delivered to Solpro for disposal
Oil Sludge drums	Sludge	260,000 lbs (solidified weight)	Solidified and bulked in drop boxes	Transfer by Waste Management	Delivered to Arlington Landfill
Tank 5 Layer 2	liquid	9,789 gal	Transferred to Vac Truck	Transported by Emerald	Delivered to Emerald for recycling

VII Distribution

To: EPA Headquarters, Washington, D.C. Attention: Terry Eby
EPA Region 10, Emergency Response Unit, Attention: Chris Field
EPA Washington Operations Office, Attention: Julie Hagensen
Puyallup Tribe of Indians, Tacoma, Attention: Joe Edgell
Washington State Department of Ecology, Attention: Jim Sachet
City of Tacoma Public Works Department, Attention: Michael Kennedy
EPA Region 10 Web page, Attention: Beth Kunz
EPA Region 10, Emergency Response Unit, Attention: OSCs

VII Status

Case Pending.